



# Memorandum

To: Honorable Magistrate Judge Donald L. Cabell  
From: Larissa Charette, Sr. U.S. Probation Officer  
CC: Michael J. Crowley, AUSA  
Robert L. Sheketoff, Defense Attorney  
Date: March 20, 2020  
Re: SOTO, Danilo, Dkt#: 1:20 cr 10024  
**Request to Withdraw Warrant and Modify Location Monitoring Condition**

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On 2/7/2020, Mr. Soto was placed under pretrial release supervision by the Honorable Magistrate Judge Donald L. Cabell. As a condition of release, he was ordered to submit to Location Monitoring (LM)/(GPS) as directed by the Pretrial Services Office or Supervising Officer and to comply with program rules.

On 3/16/2020, Pretrial Services requested issuance of a warrant based on new criminal conduct which was endorsed by Magistrate Judge Cabell on that same date. Mr. Soto subsequently posted bail on his state case before the warrant was lodged and was released. It is noted that while he was in state custody, the GPS transmitter was removed and as such, he is not currently enrolled in the LM program.

The undersigned Pretrial Services Officer has conferred with both AUSA Michael Crowley and Defense Attorney, Robert Sheketoff, and all parties have agreed to the modification of conditions proposed below. If the Court agrees to the proposed modification, then the Government and Pretrial Services is willing to withdraw the request for warrant. Given the current situation with COVID-19, if Mr. Soto is not being returned to custody on the warrant, then at the very least, he should be subject to LM at the highest level given his alleged involvement in a recent stabbing.

## **Proposed Modification of Conditions:**

The defendant shall be subject to Home Detention via Radio Frequency - Location Monitoring and is restricted to the residence at all times except as pre-approved by the Court and Pretrial Services for court purposes, meetings with counsel, medical and/or mental health treatment, religious services, employment, or other pre-approved activities.

**Petition for Action on Conditions of Pretrial Release**

PRAYING THE COURT WILL:

- ☐ Withdraw Warrant and Modify Location Monitoring Condition
- ☐ Other

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on: 3/20/2020

Place: Boston, Massachusetts

/s/ Larissa Charette

Date: 3/20/2020

Larissa Charette

Sr. U.S. Probation Officer

**ORDER OF COURT**

- ☐ Withdraw Warrant and Modify Location Monitoring Condition
- ☐ Other:

Considered and ordered this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, and ordered filed and made part of the record in the above case.

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Honorable Donald L. Cabell  
U.S. Magistrate Judge